

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION, AKRON

In Re:	)	Chapter 13 Case No. 15-50066
	)	
JOSEPH M. CAMPBELL	)	Judge Alan M. Koschik
MICHELLE K. CAMPBELL	)	
	)	
	)	<b>NOTICE OF MOTION</b>
Debtor(s).	)	

Joseph M. Campbell and Michelle K. Campbell have filed a *Motion to Allow Late-Filed Claim by Condor Capital Corp. (Claim No. 5)* in this bankruptcy case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to grant the Motion, or if you want the court to consider your views on the Motion, then on or before, **July 15, 2015**, you or your attorney must:

File with the court a written response and/or request for a hearing; and, if the court requires a written response, file with the court a written response, answer or other document explaining your position, at:

Office of the U.S. Bankruptcy Clerk  
John F. Seiberling Federal Building and U.S. Courthouse  
2 South Main Street, Room 455  
Akron, Ohio 44308

If you mail your request and/or response to the court for filing, you must mail it early enough so that the court will *receive* it on or before the date stated above.

You must also mail a copy to:

Donald L. Ross  
Attorney for Debtor(s)  
109 W. Liberty Street  
Medina, Ohio 44256

Attend the hearing on the objection, which has yet to be scheduled, but will be held in Courtroom No. 260, United States Bankruptcy Court, 2 South Main Street, Akron, Ohio 44308.

If you or your attorney do not take these steps, the court may decide that you do not oppose the Motion.

Respectfully submitted,  
BROWN, AMODIO & CHANDLER, LPA

Dated: 06/15/2015

/s/ Donald Luke Ross  
Donald Luke Ross (0085914)  
Attorney for Debtor(s)  
109 W. Liberty Street  
Medina, OH 44256  
Phone: (330) 725-8816  
Fax: (330) 723-5448  
Email: dlross@brownandamodio.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 15th of June, 2015, true and correct copy/copies of the within *Notice* was/were filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties were served with a copy of the within *Notice* and a copy of the *Motion* by regular U.S. mail, postage prepaid. All parties may access this filing via the Court's electronic filing system. The parties and/or their attorneys were served as follows:

*Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:*

Stacey A O'Stafy on behalf of Creditor Ocwen Loan Servicing, LLC  
bankruptcy@mdk-llc.com, anhsmdk@earthlink.net;anhsmdk@zuckergoldberg.com

Donald Luke Ross on behalf of Debtor Joseph M. Campbell  
dlross@brownandamodio.com, ross.434@outlook.com;ross.donald.luke@gmail.com

Donald Luke Ross on behalf of Debtor Michelle K. Campbell  
dlross@brownandamodio.com, ross.434@outlook.com;ross.donald.luke@gmail.com

Keith Rucinski, Chapter 13 Trustee  
efilings@ch13akron.com, krucinski@ecf.epiqsystems.com

*And by regular U.S. mail, postage prepaid, on:*

<p>Synchrony Bank c/o Recovery Mgmt. Systems Corp. 25 SE 2<sup>nd</sup> Ave., Ste. 1120 Miami, FL 33131-1605 <i>(Per Proof of Claim No. 4)</i></p> <p>Condor Capital Corp. 165 Oser Ave. Hauppauge, NY 11788 <i>(Per Proof of Claim Nos. 5 &amp; 6)</i></p> <p>Joseph &amp; Michelle Campbell 162 E. Bergey Street Wadsworth, Ohio 44281</p>	<p>Wells Fargo Bank, N.A. P.O. Box 10438 Des Moines, IA 50306-0438 <i>(Per Proof of Claim No. 1)</i></p> <p>Westlake Financial Services, Inc. 4751 Wilshire Blvd., Ste. 100 Los Angeles, CA 90010 <i>(Per Proof of Claim No. 3)</i></p>
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/s/ Donald Luke Ross  
Donald Luke Ross 0085914